

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

MBLAST, INC.,

Plaintiff,

v.

BRANDWATCH LLC,

Defendant.

Case No. 2:16-cv-46 - RWS

JURY TRIAL DEMANDED

AGREED MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT

Plaintiff mBLAST, Inc. (“mBLAST”) files this Agreed Motion to Stay All Deadlines and Notice of Settlement and respectfully shows the Court as follows:

Plaintiff mBLAST and Defendant Brandwatch, LLC hereby notify the Court that they have reached a settlement agreement in principle and are in the process of finalizing material terms of a settlement. The parties respectfully request that the Court stay all deadlines in this case up to and including March 21, 2016, by which time the parties expect to have executed a settlement agreement and to have jointly moved to dismiss the claims between them. This limited stay of deadlines is for good cause and so that justice may be served.

Dated: March 10, 2016.

Respectfully submitted,

/s/ Charles Ainsworth

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CERTIFICATE OF SERVICE

I hereby certify that the all counsel of record, who are deemed to have consented to electronic service are being served March 10, 2016, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3). Any other counsel of record will be served by electronic mail, facsimile transmission and/or first class mail on this same date.

/s/ Charles Ainsworth
CHARLES AINSWORTH